

**MIDDLEBROOKS SHAPIRO, P.C.**

P. O. Box 1630

Belmar, New Jersey 07719-1630

(973) 218-6877

(973) 218-6878 (fax)

Joseph M. Shapiro, Esq.

[jshapiro@middlebrooksshapiro.com](mailto:jshapiro@middlebrooksshapiro.com)

*Withdrawing Attorneys for Wilson Cotrim*

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

---

In re:

**BLOCKFI INC., et al.,**

Debtors.

---

Chapter 11

Case No. 22-19361-MBK  
(Jointly Administered)

Honorable Michael B. Kaplan, Chief Judge

**APPLICATION IN SUPPORT OF ENTRY OF PROPOSED  
CONSENT ORDER AUTHORIZING WITHDRAWAL OF APPEARANCE BY  
MIDDLEBROOKS SHAPIRO, P.C. ON BEHALF OF WILSON COTRIM  
PURSUANT TO D.N.J. LBR 9010-2(b) AND D.N.J. LBR 9021-1(b)  
AND GRANTING RELATED RELIEF**

Middlebrooks Shapiro, P.C. (the “Applicant”) hereby moves by way of application for entry of a proposed *Consent Order Authorizing Withdrawal of Appearance by Middlebrooks Shapiro, P.C. on behalf of Wilson Cotrim pursuant to D.N.J. LBR 9010-2(b) and D.N.J. LBR 9021-1 and Granting Related Relief* (the proposed “Consent Order”), and states as follows:

**BRIEF BACKGROUND**

On November 28, 2022, debtor BlockFi, Inc. and its debtor affiliates (collectively, the “Debtor”), by and through counsel, filed its voluntary Chapter 11 Petition (Docket No. 1).

On August 3, 2023, the Debtor filed a Seventh Omnibus Objection to Certain Claims, which objection is currently returnable October 10, 2023 (Docket No. 1311) (the “Objection”).

On August 22, 2023, the Applicant filed a Notice of Appearance and Request for Service of Notice on behalf of Wilson Cotrim (“Mr. Cotrim”) (Docket No. 1388).

On September 5, 2023, the Debtor filed a *Motion to Quash Subpoena for Rule 2004 Examination* directed to Mr. Cotrim, which motion is currently returnable October 10, 2023 (Docket No. 1447).

On September 13, 2023, Mr. Cotrim, by and through the Applicant, filed a Certification in Response to the Objection (Docket No. 1483) (the “Response”).

On September 28, 2023, Mr. Cotrim executed the proposed Consent Order filed in support of this Application which, *inter alia*, permits Mr. Cotrim to proceed in this case *pro se* creditor, and permits Middlebrooks Shapiro, P.C. to withdraw as Mr. Cotrim’s counsel in this case.

### **REQUEST FOR RELIEF**

The Applicant seeks entry of the proposed Consent Order, and hereby moves by way of this Application: (1) for permission for Mr. Cotrim to proceed in this case *pro se* creditor; (2) for permission for Middlebrooks Shapiro, P.C. to withdraw as Mr. Cotrim’s counsel in this case; and (3) for such other relief deemed just and equitable.

Mr. Cotrim seeks to represent himself *pro se* in this case and Applicant seeks permission from this Court to withdraw its appearance on behalf of Mr. Cotrim.

Local Bankruptcy Rule 9010-2(b), entitled “Withdrawal of appearance”, states: “Unless another attorney is substituted, an attorney may not withdraw an appearance except by permission of court.” D.N.J. LBR 9010-2(b).

Further, Local Bankruptcy Rule 9021-1(b), entitled “Consent order in lieu of motion”, states: “A proposed consent order submitted in lieu of a motion may be presented by application.

The application must include the facts and law supporting entry of the proposed consent order.”  
D.N.J. LBR 9021-1(b).

In addition to the Rules cited above, under Section 105(a) of the Bankruptcy Code, this Court has broad discretion to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title” 11 U.S.C. § 105(a). *See also Marrama v. Citizens Bank of Mass.*, 549 U.S. 365, 375 (2007) (noting that bankruptcy courts have “broad authority” under Section 105(a)).

### **CONCLUSION**

Based upon the foregoing facts and authorities, the Applicant respectfully submits that this Court has the authority to grant the relief requested herein, and that good cause supports entry of the proposed Consent Order, and for this Court to grant the Applicant such other and further relief as is just and proper.

Respectfully submitted,

**MIDDLEBROOKS SHAPIRO, P.C.**

P. O. Box 1630

Belmar, New Jersey 07719-1630

(973) 218-6877

(973) 218-6878 (fax)

*Withdrawing Attorneys for Wilson Cotrim*

/s/ Joseph M. Shapiro

---

By: Joseph M. Shapiro, Esq.

Dated: October 2, 2023